



STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR
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DEPARTMENT OF NATURAL RESOURCES
JEFFREY R. VONK, DIRECTOR

December 13, 2006

«FirstName» «LastName»
«Title»
«FacilityName»
«MailingAddress»
«MailingAddress2»
«City», «State» «Zip»

Re: REMINDER –Air Emission Inventory and other Title V Reporting Requirements
EIQ #: «EIQ_No», Facility #: «Facility_No»

Dear «Greeting» «LastName»:

This is to remind you of emission inventory and several other reporting requirements due for facilities subject to Title V of the Clean Air Act. Please note that your facility may have additional reporting requirements not listed below.

<u>Title V Report</u>	<u>Due Date</u>
Emissions Inventory	March 31, 2007
Fee Payment	July 1, 2007
Annual Compliance Certification	*March 31, 2007
Semi-Annual Monitoring Report	*March 31, 2007 & **September 30, 2007

* Required only if your initial Title V permit was issued prior to January 1, 2007.

** Required only if your initial Title V permit was issued prior to July 1, 2007.

New for 2006 Inventory: You must report the emissions of PM_{2.5} and ammonia on your 2006 and future emission inventories. You must use the updated inventory forms and instructions that can be downloaded from Air Quality Bureau's website (www.iowacleanair.com). If you prepare and/or submit your emissions inventory using SPARS (State Permitting and Air Reporting System), please follow SPARS instructions on how to report PM_{2.5} and ammonia emissions. Please read the attached frequently asked questions for the Title V Emissions Inventory for more detailed information.

Please note that the frequently asked questions have been updated, and include new items of interest for facilities subject to the Title V program. If you have additional questions regarding the Emissions Inventory or Fee Payment reports, please call Chris Kjellmark at (515) 281-7826 or Weston Li at (515) 281-8549. Please call Dennis Thielen at (515) 281-4899 if you have any questions about the Annual Compliance Certification or Semi-Annual Monitoring Report.

Sincerely,

Douglas A. Campbell
Supervisor, Air Operating Permits Section

Enclosures: Title V Emissions Inventory FAQs
Emission Inventory SPARS Training Announcement

Title V Emissions Inventory FAQ's

What's New For 2006 EIQ?

◆ Do I need to report PM_{2.5} and ammonia emissions?

Yes. Beginning with the 2006 Emission Year, you must report PM_{2.5} and Ammonia emissions on your annual emissions inventories.

The EPA's Consolidated Emission Reporting Rule requires the DNR to report PM_{2.5} and ammonia emissions as part of the National Emissions Inventory.

◆ What forms do I use to report PM_{2.5} and ammonia emissions?

Title V operating permit application Forms 4.0 and 5.0 and instructions have been modified to include spaces for you to report PM_{2.5} and ammonia emissions. Please download the updated forms and instructions (updated 12-1-2006) from Air Quality Bureau's website <http://www.iowacleanair.com/>. Please note that CAS number for Ammonia is 7664-41-7.

If you report emissions using SPARS, follow the SPARS instructions.

◆ Where can I get the emission factors for PM_{2.5} and ammonia emissions?

You may obtain PM_{2.5} and ammonia emission factors from EPA's FIRE. The most current version of the database is FIRE 6.25. EPA has also developed a new Internet version of the database called WebFIRE. It is available at <http://www.epa.gov/ttn/chief/efpac/index.html>.

Please contact us for additional sources of emission factors.

◆ Do Title V facilities have to pay fees on PM_{2.5} and Ammonia emissions?

No. The PM_{2.5} emissions are a subset of PM₁₀ emissions, which the Title V facilities already pay fees on. Ammonia does not meet the definition of "regulated air pollutant" for Title V fee purposes.

◆ SPARS Web

SPARS Web is the online version of the State Permitting and Air Reporting System software. The online version eliminates issues with user maintenance and multi-user access, as well as providing secure ease-of-use access from most Internet providers.

SPARS Web also eliminates significant user maintenance time and the need to transfer data on CD-ROM or diskette, thereby making it easier for regulated customers to submit permit applications and emission inventories. Please note that we are no longer accepting SPARS emissions inventories on CD-ROM or disks.

Before using SPARS Web, an account must be created for your facility. For more information, contact the DNR's Robin Horkey at 515-281-8568 or robin.horkey@dnr.state.ia.us.

◆ WebFIRE (Factor Information Retrieval System)

WebFIRE is the EPA's internet version of FIRE. The FIRE application web site provides complete access to EPA's air emission factor information, and will allow for more frequent updates. In the future, WebFIRE will replace the software application, FIRE version 6.25, and the Microsoft Access version of the database.

[\(http://www.epa.gov/ttn/chief/\)](http://www.epa.gov/ttn/chief/)

◆ MEK delisted as a HAP

Methyl ethyl ketone (MEK, 2-Butanone, CAS# 78-93-3) has been removed from the list of hazardous air pollutants (HAP). Therefore, you should not report MEK as a HAP in the inventories; however, it should be included in your volatile organic compounds (VOC) total because it is still considered a VOC.

◆ T-Butyl Acetate no longer a VOC

T-butyl acetate (tertiary butyl acetate, TBAC, CAS# 540-88-5) is no longer considered a VOC for purposes of VOC emissions limitations or VOC content requirements. Therefore, you should not include its emissions in your VOC emissions.

However, 40 CFR 51.100(s)(5) requires you uniquely identify its emissions in inventories. Thus, you should report the emissions of t-butyl acetate on Forms 4.0 (page 2) and 5.0 (page 2), but they are not subject to fees.

◆ Filterable vs. Condensable vs. Primary Particulate Matter (PM)

Primary (sum of filterable and condensable) PM_{2.5}, PM₁₀, and PM emissions should be reported on Forms 4.0 and 5.0. DNR recognizes that some emission units may be subject to filterable PM emission limits from federal regulations. The compliance demonstration method will remain the same in these instances. However for emissions inventory purposes, DNR reports primary PM_{2.5}, PM₁₀, and PM emissions to the EPA to meet the National Emissions Inventory obligations.

◆ What compounds are included in the glycol ethers category?

Glycol ethers are hazardous air pollutants as defined in IAC rule 22.100. Thousands of compounds are included in the glycol ethers category. The DNR suggests referring to the EPA document entitled "Toxics Release Inventory: List of Toxic Chemicals within the Glycol Ethers Category" for a list of compounds that are considered glycol ethers. This document is available at

<http://www.epa.gov/ttn/atw/glycol2000.pdf>.

Title V Emissions Inventory FAQ's (Continued)

Additional FAQ's

When is the emissions inventory due?

It must be post-marked by March 31.

What forms are required?

Forms 1.0, 4.0, 5.0, and Part 3.

Note: only the bottom section of Part 3 needs to be signed - "Certification of Truth, Accuracy and Completeness"

Where can I get the forms and instructions?

The forms can be downloaded from the Air Quality Bureau's web page (www.iowacleanair.com). First click on the 'Operating Permits' link on the left side of the page. Then click on 'Applications, Emissions Inventory/Fee Payment - Forms & Instructions.' To request a paper copy call (515) 281-7826.

How many copies should be submitted?

Two, unless your facility is located in Linn or Polk County.

Three copies are required if your facility is located in Linn or Polk County.

Where do I send the emissions inventory?

Attention: Douglas A. Campbell
Iowa DNR, Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, IA 50322

Can I submit electronically?

Yes. For more information visit our web page (www.iowacleanair.com) and click on the 'SPARS' link.

When is the fee payment due? Will I be notified of the fee rate?

It must be post-marked by July 1. The Title V fee rate will be set in May by the Environmental Protection Commission. Your company will be notified in writing after the fee rate is set.

Have any of the forms changed since last year?

Yes. Forms 1.0, 4.0, and 5.0 were updated. Make sure the forms you are using are dated 12-1-2006.

How should actual emissions be calculated?

Emission estimations should be based on continuous emission monitoring data, stack test data, mass balance, or EPA approved emission factors. If none of these methods are available, an emission factor from a similar source can be substituted, considering the characteristics of the material being processed or handled are similar.

Can I include just a total of all the HAPs emitted on Forms 4.0 and 5.0, instead of reporting them separately?

No. HAP emissions need to be listed separately on Forms 4.0 and 5.0, along with the appropriate Chemical Abstract Service (CAS) number.

Is there a de minimus level for reporting emissions?

Yes. Emission totals reported on Form 4.0 only need to be reported to the nearest hundredth of a ton (### tons/yr). Emission totals greater than or equal to 0.005 tons/yr should be rounded up to the nearest hundredth of a ton, and reported on Form 4.0. Emission totals less than 0.005 tons/yr do not need to be reported.

Do I need to calculate emissions and pay fees for emissions from insignificant activities?

No. According to subrule 567 IAC 22.106(7), fees are not required for insignificant activities.

How do I avoid double-counting HAP emissions?

Most hazardous air pollutants (HAPs) are also considered VOCs (VOC HAP) or particulate matter (PM HAP). For a listing of these, please visit the technical guidance portion of the Operating Permits section's web page. You are required to report the totals for each HAP emitted on Forms 4.0 and 5.0. However, you are not required to pay fees twice for the same emissions.

If a HAP you reported on page 2 of Form 5.0 is also included in the VOC or PM₁₀ total reported on page 1 of Form 5.0, DO NOT include the value in the Emissions Subject to Fees column. Enter "0.00" instead.

If I do not need to pay fees on PM_{2.5}, total particulate matter, carbon monoxide, or ammonia emissions, then why do I need to report them on Forms 4.0 and 5.0?

Although they are considered regulated pollutants, you are not required to pay fees on PM_{2.5}, total particulate matter (PM), and carbon monoxide (CO) emissions. However, you are still required to report PM_{2.5}, PM, and CO emissions on Forms 4.0 and 5.0 because many sources have applicable requirements for these pollutants. The DNR also uses the totals for planning and inventory purposes and that is the sole purpose for requiring ammonia inventories at this time. Please note that fees are required for PM₁₀ emissions.

Will DNR send another reminder as the deadline gets closer?

Yes, as the March 31 deadline approaches, the DNR will send a reminder on the Air Quality Bureau's list server. Directions for subscribing to the list server are as follows:

HOW TO SUBSCRIBE:

The DNR is offering a list server to deliver timely air pollution control information directly to your email. Targeted to those actively engaged in permitting and regulatory compliance, the "iairtech" listserver offers the regulated public and consultants regulatory news, program updates, and technical guidance. To subscribe, send a blank E-mail to: join-iairtech@lists.ia.gov. The subject line should be left blank. If you have questions, comments or ideas for list serve topics, please contact the DNR's Jill Cornell at 515-281-7832 or email jill.cornell@dnr.state.ia.us.



Learn how to submit your 2006 Emission Inventory with just a few clicks!



In just three hours, you will find out how to:

- Create your new emission inventory using your company's 2005 Emission Inventory as a template;
- Update this template to reflect the 2006 emissions data; and
- Submit electronically the newly created 2006 inventory to the DNR.

Several sessions will be held from January 29 through February 2, 2007. Please call 515-242-5100 to reserve your seat. For more information, please visit us at www.iowacleanair.com

